

*California Environmental Quality Act*  
(CEQA)

INITIAL STUDY

Supporting the Preparation of a Mitigated Negative Declaration

for

Revision of Categorical Waiver of Waste Discharge Requirements for Timber  
Harvest Activities on Non-Federal Lands in the North Coast Region

April 7, 2009

California Regional Water Quality Control Board, North Coast Region  
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## PROJECT DESCRIPTION

This project involves revising the *Categorical Waiver of Waste Discharge Requirements for Timber Harvest Activities on Non-Federal Lands in the North Coast Region* (Order No. R1-2004-0016 [2004 Non-Federal Timber Waiver]), by adopting and implementing a revised Non-Federal Timber Waiver (revised Non-Federal Timber Waiver). The revised Non-Federal Timber Waiver will supersede the 2004 Non-Federal Timber Waiver. Specific categories of Projects that were previously enrolled under the 2004 Non-Federal Timber Waiver will be automatically enrolled under the revised Non-Federal Timber Waiver following its approval by the North Coast Regional Water Quality Control Board (Regional Water Board). Non-Industrial Timber Management Plans would be required to enroll in the revised Non-Federal Timber Waiver after one year after it is approved by the Regional Water Board and prior to their next notice of timber operations.

The Regional Water Board may waive the requirement for persons or entities proposing timber harvest projects to submit Reports of Waste Discharge and/or obtain Waste Discharge Requirements for discharges, or threatened discharges, of wastes (such as: earthen materials (i.e., soil, silt, sand, clay, and rock), and organic materials (i.e., slash, sawdust, and bark) resulting from timber harvest activities in the North Coast Region, provided the waiver is consistent with any applicable state or regional water quality control plan and is in the public interest. The revised Non-Federal Timber Waiver identifies five categories of activities described by eligibility criteria for each category. To be eligible for the revised Non-Federal Timber Waiver, persons must comply with specific criteria and conditions set forth to ensure that impacts to water quality remain at less than significant levels.

The definition of **timber harvesting activities** for the purpose of this project is:

commercial and non-commercial activities relating to forest management and timberland conversions. These activities include the cutting or removal or both of timber and other solid wood forest products, including Christmas trees, as well as, but not limited to, construction, reconstruction and maintenance of roads, fuel breaks, firebreaks, watercourse crossings, landings, skid trails, or beds for the falling of trees; fire hazard abatement and fuel reduction activities; burned area rehabilitation; site preparation that involves disturbance of soil or burning of vegetation following timber harvesting activities; but excluding preparatory tree marking, surveying or road flagging.

The revised Non-Federal Timber Waiver will apply to these activities throughout the North Coast region.

## **SPECIFICS OF THE PROPOSED PROJECT**

Proposed revisions to the 2004 Timber Waiver include both minor changes (i.e., grammar and document organization) as well as more substantial changes (i.e., revising the categories, eligibility criteria, and application and enrollment procedures, and monitoring requirements). The scope of the environmental analysis within this Initial Study is limited to these proposed changes.

The revised Non-Federal Timber Waiver is attached to this Initial Study.

## **PURPOSE OF AND NEED FOR PROJECT**

The purpose of the project is to revise the 2004 Non-Federal Timber Waiver, which expires on June 23, 2009, to protect water quality, clarify waiver requirements, and facilitate compliance with waiver conditions. These proposed revisions are being made based on Regional Water Board experience with implementation and oversight of the 2004 Non-Federal Timber Waiver over the past five years and to changes in response to changing conditions, such as, declines in populations of anadromous salmonids and increased listings for under Section 303(d) of the Clean Water Act for impairment due to elevated water temperatures.

## **CONSISTENCY WITH PLANS AND POLICIES FOR WATER QUALITY PROTECTION**

Under this revised Non-Federal Timber Waiver, the Regional Water Board will continue to waive waste discharge requirements for specified discharges associated with timber harvest activities within the North Coast Region. Similar to the 2004 Non-Federal Timber Waiver, the revised Non-Federal Timber Waiver will be conditional and may be terminated at any time by the Regional Water Board pursuant to Water Code section 13269, subdivision (a)(2). To ensure that the revised Timber Waiver is in the public interest and consistent with the Basin Plan, new or modified eligibility criteria and general and specific waiver conditions are proposed for the revised Timber Waiver, in accordance with the Water Code section 13269, subdivision (a)(1).

The general and specific conditions proposed for each revised Timber Waiver category are designed to ensure that activities carried out under the revised Non-Federal Timber Waiver will not adversely impact water quality. Notification and application requirements provide a mechanism for Regional Water Board staff to provide feedback on timber harvest proposals to ensure eligibility and compliance with conditions of the Non-Federal Timber Waiver and that management measures are implemented and effective to avoid water quality impacts. Monitoring and reporting requirements are intended to further ensure compliance and to verify the adequacy and effectiveness of the revised Non-Federal Timber Waiver's conditions.

The revised Non-Federal Timber Waiver does not limit or change the existing authorities or responsibilities of other agencies. For example, on private timberlands, CAL FIRE is the lead agency for issuing permits to timberland owners and operators performing

vegetation management activities within the project area. As the lead agency for timber harvesting activities, CAL FIRE's process has been deemed by the California Resources Agency as a CEQA functionally equivalent process. On lands owned and/or managed by the State of California (i.e., California Department of Parks and Recreation), timber activities are not regulated by CAL FIRE, so that enrollment in the Waiver to conduct timber harvest activities cannot be approved until additional environmental analysis in compliance with CEQA has been completed.

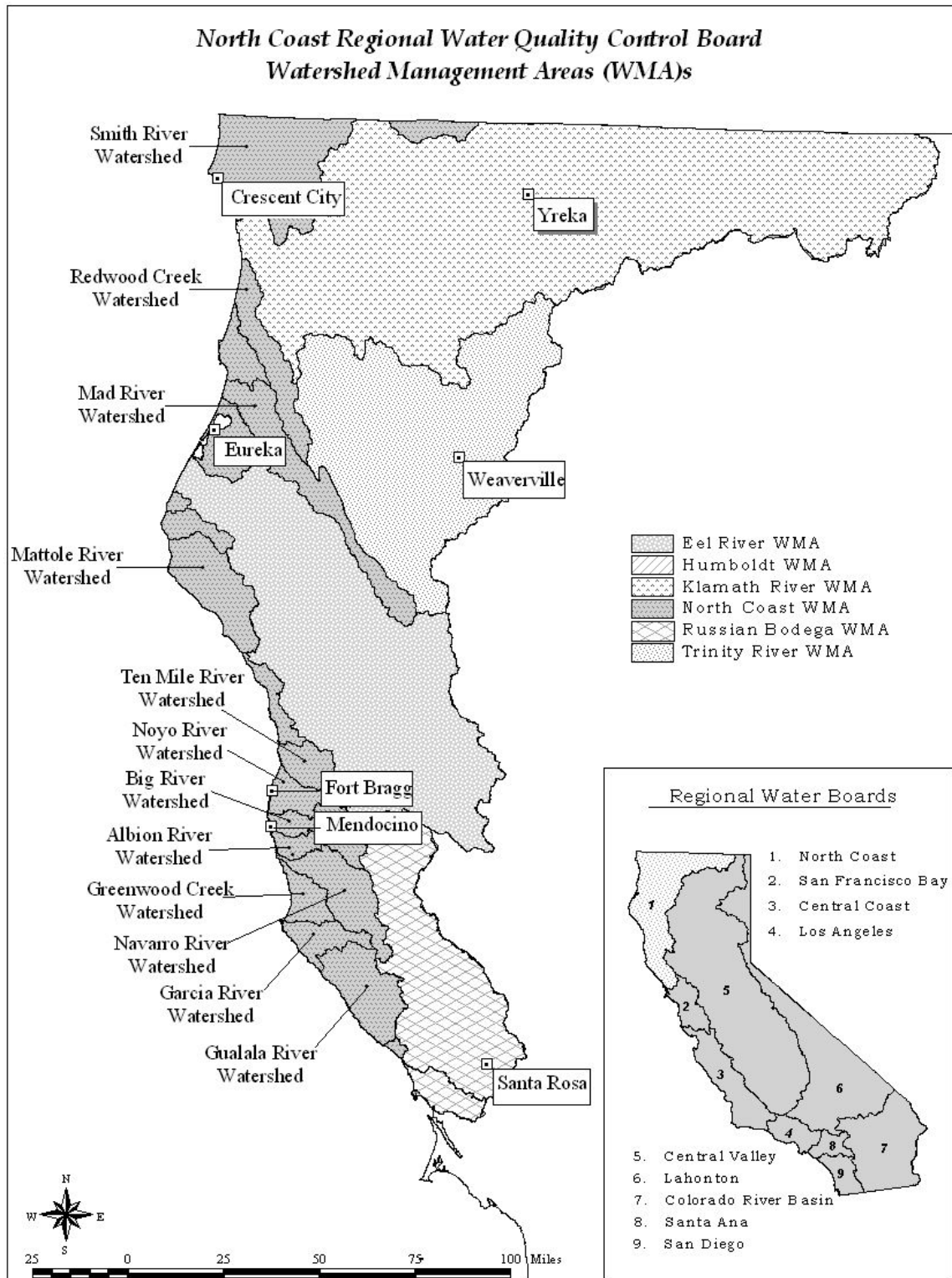
As described above, the proposed project is consistent with applicable plans and policies regarding water quality protection in the North Coast Region. The Regional Water Board proposes to make a determination that the timber harvest activities conducted in compliance with the conditions described within the revised Non-Federal Timber Waiver are consistent with the Water Quality Control Plan for the North Coast Region (Basin Plan) and is in the public interest pursuant to Water Code section 13269, subdivision (a)(1).

## **ENVIRONMENTAL SETTING**

The North Coast Region (Figure 1), which comprises all watersheds, including Lower Klamath Lake and Lost River Basins, draining into the Pacific Ocean from the California-Oregon state line on the north, and the boundary of the watershed of the Estero de San Antonio and Stemple Creek in Marin and Sonoma Counties to the south. The North Coast Region encompasses a total area of approximately 19,390 square miles, including 340 miles of scenic coastline and remote wilderness areas, as well as urbanized and agricultural areas. The region is divided into two natural drainage basins, the Klamath River Basin and the North Coastal Basin and includes jurisdiction of all of Del Norte, Humboldt, Trinity, and Mendocino Counties, major portions of Siskiyou and Sonoma Counties, and small portions of Glenn, Lake, and Marin Counties.

The North Coast Region is characterized by distinct temperature zones. Along the coast, the climate is moderate and foggy and the temperature variation is not great. For example, at Eureka, the seasonal variation in temperature has not exceeded 63°F for the period of record. Inland, however, seasonal temperature ranges in excess of 100°F have been recorded. Precipitation over the North Coast Region is greater than for any other part of California, and damaging floods are a fairly frequent hazard.

Ample precipitation in combination with the mild climate found over most of the North Coast Region has provided a wealth of fish, wildlife, and scenic resources. The mountainous nature of the Region, with its dense coniferous forests interspersed with grassy or chaparral covered slopes, provides shelter and food for deer, elk, bear, mountain lion, furbearers and many upland bird and mammal species. The numerous streams and rivers of the Region contain anadromous fish, and the reservoirs, although few in number, support both coldwater and warm water fish.



**Figure 1: Project Area (North Coast Region)**

## DISCUSSION OF POTENTIAL EFFECTS OF PROPOSED PROJECT

CEQA requires a Lead Agency to prepare an Initial Study to determine whether a project may have a significant effect on the environment (California Code of Regulations, (CCR) title 14, section 15063(a)). A "significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CCR 14, section 15382). If the Initial Study does not show that there is substantial evidence, in light of the whole record before the agency, that a project may have a significant effect on the environment, a Negative Declaration may be prepared. If the Initial Study identifies potentially significant effects, but identifies revisions or conditions to mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration may be prepared (CCR title 14, section 15070).

The Regional Water Board has waived waste discharge requirements for timber harvest activities since 1988. Currently timber harvesting plans that meet certain condition are waived under Order No. R1-2004-0016, which was approved by the Regional Water Board on June 23, 2004. Based on an Initial Study and Negative Declaration, the Regional Water Board determined that the 2004 Non-Federal Timber Waiver would not result in significant adverse environmental impacts, either individually or cumulatively. The revised Non-Federal Timber Waiver contains substantive changes over past Timber Waivers in several areas. This initial study evaluates the potential impacts that could result from changes made to the 2004 Non-Federal Timber Waiver. In general, these changes are intended to provide increased protection to water quality. Substantive changes include:

- Development of Erosion Control Plans (ECP) will be required for an entire area of a new Non-industrial Timber Management Plan (NTMP) prior to seeking coverage under the revised Non-Federal Timber Waiver. Previously, the ECP was required only for those portions of a NTMP Project area where harvest operations occurred. As such, controllable sediment discharge sources could potentially fail and discharge before they were identified and treated. The new requirement will increase the likelihood that potential sediment discharge sources will be identified and treated prior to failure.
- A new requirement that ECPs be developed and implemented for Timber Harvesting Plans (THP). The new requirement will likely result in identification of additional controllable sediment discharge sites to be corrected from a larger land base.
- Winter period inspections of the Project area will be required along with the submittal of an annual report to the Regional Water Board. This new requirement is intended so that Project proponents monitor Project areas to ensure measures to prevent and minimize sediment discharges are effective, to identify and correct problems in a timely manner, and to provide a feedback mechanism to the Regional Water Board

on the effectiveness of conditions of the Non-Federal Timber Waiver. This will likely increase the effectiveness of ECPs in controlling sediment discharge.

- Once timber harvest activities are completed, roads on THPs and NTMPs will now be required to be hydrologically disconnected from watercourses, to the extent feasible. Hydrologically disconnecting roads consists of minimizing alteration of natural drainage patterns and preventing concentrated storm runoff from discharging into watercourses. Other erosion control treatments will be required for road segments that cannot be hydrologically disconnected from watercourses to prevent and minimize surface erosion. This will likely reduce the potential for sediment delivery to watercourses from surface erosion on roads on a greater land base than previous waivers.
- Long term management plans for roads (Road Plan) will now be required to be developed for all NTMPs. The goal of Road Plans is to prevent and minimize sediment discharge from roads by ensuring that roads and road watercourse crossings meet current standards and are maintained on a regular basis. The Road Plan requires Project proponents to submit an inventory of roads and road watercourse crossings as well as an implementation and maintenance schedule for upgrading road segments that do not meet current standards. A time schedule for compliance with this condition is included in the Waiver.
- Conditions intended to comply with the Regional Water Board water temperature objective are added, with the option to propose an approach for meeting that objective or comply with increased overstory canopy within stream riparian areas. In lieu of an acceptable approach to meeting the temperature objective for natural stream temperatures, an 85% overstory canopy will be required within the first 50 feet of watercourses that have cold-water beneficial uses or are within 1000 lineal feet of a fish bearing streams (defined as Class II watercourse and lake protection zone (WLPZ) in the Forest Practice Rules) and 65% retention within the remainder of the WLPZ. The 2004 Non-Federal Timber Waiver required 70% overstory canopy throughout the entire Class II WLPZ for THPs. No specific conditions applied to WLPZ canopy retention for coverage of NTMPs under the 2004 Non-Federal Timber Waiver. This is intended to preserve and restore natural shade and comply with the Basin Plan temperature objective.
- Additional retention of trees that provide shade to Class I and Class II streams during critical summer months (i.e. June, July, August, and September) will be a condition for waiver coverage for THPs and NTMPs. Reduced shade requirements may be proposed, based on site specific conditions, when it can be demonstrated to the satisfaction of the Regional Water Board that such alternative provide equal or better protection. The shade requirement may extend outside the WLPZ when the overstory canopy within the first 75 feet of a Class I WLPZ (50 feet for Class II WLPZs) is less than 85% or the majority of trees are below their full site potential height, or when the overstory canopy beyond the first 75 feet of a Class I WLPZ (50 feet for Class II WLPZs) is less than 65% or the majority of trees are below their full



site potential height. The 2004 Non-Federal Timber Waiver did not contain conditions for retention of shade trees beyond the Forest Practice Rules. This is intended to meet the region wide Basin Plan temperature objective.

- When even aged harvesting methods are proposed for THPs and NTMPs, post harvest stocking standards (the amount of trees remaining after harvesting) outside of the WLPZ will be required to be at least 65%, and be made up of commercial tree species at least 30 feet in height. This post harvest stocking requirement was 75% in the 2004 Non-Federal Timber Waiver. This resulted in greater canopy retention *outside* of the WLPZ than that required within the WLPZ. This has been modified for the sake of consistency, while still being protective of water quality. The Forest Practice Rules do not allow even aged harvesting methods on NTMPs, and therefore, this specific condition does not apply to NTMPs.
- A new eligibility criterion is proposed in the revised Non-Federal Timber Waiver that allows even-aged (i.e. clearcutting) harvesting methods, which maintain a canopy closure of less than 65%, comprised of commercial species at least 30 feet in height, providing the Project includes a riparian management zone (RMZ) within 300 feet of a Class I watercourse, 200 feet from a Class II watercourse, and 100 feet of a Class III watercourse. Prescriptions within the RMZ include; no harvest for the first 30 feet on Class I and II watercourses and 10 feet for Class III watercourse, retention of 85% total canopy between 30 and 150 feet from Class I watercourses, 30 and 100 feet of Class II watercourses, and 50 feet of Class III watercourses; and retention of 65% total canopy between 150 and 300 feet Class I watercourses, 100 and 200 feet of Class II watercourses, and 50 and 100 feet of Class III watercourses. This will likely increase the number of harvest plans that will be eligible for the Waiver while ensuring that timber harvesting activities do not pose a significant threat to water quality.

Overall, proposed changes in the revised Non-Federal Timber Waiver are intended to meet Basin Plan objectives, prohibitions, and action plans, and protect, maintain, and restore water quality. However, some of the proposed changes could have short term effect on the environment in the project area as compared to current timber harvesting activities waived under the 2004 Non-Federal Timber Waiver. For example, expanding the requirement of erosion control plans for timber harvest plans as well as NTMPs, could result in short term impacts to water quality caused by the disturbance associated with repair of sites that may be stable in the near term. In developing the revised Non-Federal Timber Waiver, additional criteria and conditions, and monitoring requirements have been considered to ensure that the activities that proceed under the revised Non-Federal Timber Waiver will not result in significant impacts. These criteria and conditions limit the scope, extent and nature of activities that are eligible for the revised Non-Federal Timber Waiver. Monitoring requirements will evaluate the efficacy of these stipulations in protecting water quality.

Therefore, activities that are designed and implemented to comply with the conditions and criteria of the revised Non-Federal Timber Waiver will have less than significant impacts on the environment. Project proponents of timber harvesting activities that are

not designed (or revised) to meet the conditions and criteria for this revised Non-Federal Timber Waiver must file a Report of Waste Discharge with the Regional Water Board, containing discharge-specific information as required. Regional Water Board would then consider whether to issue an individual waiver, or Waste Discharge Requirements for that activity.

Further, as noted above, the revised Non-Federal Timber Waiver would not limit or change the existing requirements, authorities, or responsibilities of the Regional Water Board and other agencies, nor does it allow discharges which would result in Basin Plan violations, or the creation of a pollution or nuisance. Where applicable, these requirements and authorities of other agencies are described in the following checklist.

For each CEQA factor, the Regional Water Board evaluated potential environmental effects from proposed changes from the 2004 Non-Federal Timber Waiver. The following checklist describes the criteria and conditions included in the proposed revised Non-Federal Timber Waiver to reduce potential impacts to less than significant levels.

## INITIAL STUDY/ENVIRONMENTAL CHECKLIST

1. **Project title:**

Categorical Waiver of Waste Discharge Requirements for Discharges Resulting from Timber Harvest Activities on Non-Federal Lands in the North Coast Region.

2. **Lead agency name and address:**

California Regional Water Quality Control Board, North Coast Region (Regional Water Board)  
5550 Skylane Blvd.  
Santa Rosa, CA 95403

3. **Preparer and phone number:**

Jim Burke, (707) 576-2289

4. **Project location:** North Coast region (Figure 1), which comprises all basins including Lower Klamath Lake and Lost River Basins draining into the Pacific Ocean from the California-Oregon state line southerly to the southerly boundary of the watershed of the Estero de San Antonio and Stemple Creek in Marin and Sonoma Counties.

5. **Project sponsor's name and address:**

North Coast Regional Water Board  
5550 Skylane Blvd.  
Santa Rosa, CA 95403  
Attn: Jim Burke

8. **Brief Description of project:**

This project involves the revision of the existing Non-Federal Timber Waiver (Order No. R1-2004-0016) by the adoption and implementation of a Board Order that will continue to conditionally waive waste discharge requirements for specified discharges associated with timber harvesting activities within the North Coast Region.

9. **Surrounding land uses and setting:**

Rangeland grazing, recreation, gravel mining, timber harvest, irrigated agriculture, open space, and urban uses.

10. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.)

Projects enrolling in this Categorical Waiver must first be approved by Cal Fire, having undergone a CEQA functional equivalent environmental review process, or otherwise be in compliance with CEQA. This Categorical Waiver may be superseded by the adoption by the State Water Board or Regional Water Board of specific waste discharge requirements or general waste discharge requirements for types of discharges covered by this project.

This project does not preclude the need for persons conducting timber harvest activities to obtain permits which may be required by other local, state and federal governmental agencies.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors marked below would be potentially affected by this project, as indicated by the checklist on the following pages.

	Aesthetics		Agriculture Resources		Air Quality
X	Biological Resources		Cultural Resources	X	Geology Soils
	Hazards & Hazardous Materials	X	Hydrology/Water Quality		Land Use / Planning
	Mineral Resources		Noise		Population/Housing
	Public Services		Recreation		Transportation/Traffic
	Utilities/Service Systems	X	Mandatory Findings of Significance		

## DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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Signature

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Date

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. (California Code of Regulations, title 14 Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b> -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?	X			
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	X			
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?				X

- a-c) Timber harvesting activities could have aesthetic impacts; however, the revised Non-Federal Timber Waiver would not alter or weaken the need to comply with existing regulations regarding aesthetic values that currently apply to activities regulated under the 2004 Non-Federal Timber Waiver. Therefore, it is not anticipated that the adoption and implementation of the revised Non-Federal Timber Waiver would affect the nature or extent of any aesthetic impact over current conditions (i.e., regulation of timber harvest and vegetation management activities under the 2004 Non-Federal Timber Waiver).

Therefore, because the revised Non-Federal Timber Waiver would not alter or weaken the need to comply with existing regulations regarding aesthetic values that currently apply under the 2004 Non-Federal Timber Waiver the appropriate finding is **no impact**.

- d) The proposed project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views; therefore, the appropriate finding is **no impact**.

<b>II. AGRICULTURE RESOURCES:</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				X

- a-c) The proposed project would not involve converting or re-zoning agricultural land to non-agricultural use. There will be no change to agricultural resources in the project area over existing conditions due to the revised Timber Waiver; therefore, the appropriate finding is **no impact**.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				X
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				X
d) Expose sensitive receptors to substantial pollutant concentrations?				X
e) Create objectionable odors affecting a substantial number of people?				X

a-e) Timber harvesting activities may generate dust emissions as the result of road and trail construction and use, and the construction of landings and pads. Nitrogen and sulfur oxides may be emitted during timber harvesting activities, including from use of heavy equipment engines. Smoke will be emitted during prescribed burning of logging slash. However, it is not anticipated that the revised Non-Federal Timber Waiver will result in an increase in these emissions over current conditions (i.e., regulation of timber harvest activities under the 2004 Non-Federal Timber Waiver).

Therefore, because the revised Non-Federal Timber Waiver would not alter or weaken the need to comply with existing regulations regarding air quality that currently applies under the 2004 Non-Federal Timber, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES --</b> Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

- a-d) The revised Non-Federal Timber Waiver contains both general and category-specific conditions and criteria to ensure that activities that proceed under the revised Non-Federal Timber Waiver will have less than significant impacts to biological resources, including candidate, sensitive or special status species or their habitat (including wetlands, riparian areas and/or nursery sites).

Non-Federal Timber Waiver General Condition 2 requires compliance with the Basin Plan, which requires that water quality standards and waste discharge prohibitions must not be violated by activities that proceed under the revised Timber Waiver. The Basin Plan specifies region-wide water quality objectives for waste discharges subject to this revised Non-Federal Timber Waiver. These objectives set narrative or numeric limits for constituents that may be associated with timber harvest activities such as biostimulatory substances, dissolved oxygen, floating materials, pH, sediment, settleable and suspended materials, temperature, toxicity, nondegradation of aquatic communities and populations, and pesticides.

These water quality objectives are established to protect beneficial uses of the region's waters. The water quality objectives in conjunction with the identification of water body-specific beneficial uses constitute the water quality standards. Beneficial use designations in the North Coast Region incorporate protection of biological habitats and sensitive species, including 8 separate designations for biological resources (Warm Freshwater Habitat; Cold Freshwater Habitat; Inland Saline Water Habitat; Wildlife Habitat; Preservation of Areas of Special Biological Significance; Rare, Threatened, or Endangered Species; Migration of Aquatic Organisms; Spawning, Reproduction, and Development). Since the revised Non-Federal Timber Waiver requires compliance with the Basin Plan, all of these beneficial uses are protected from adverse impacts of timber harvest activities. Additionally, the revised Non-Federal Timber Waiver contains specific conditions related to preventing sediment transport to water bodies and protection of riparian vegetation. Therefore, activities that proceed in compliance with the revised Non-Federal Timber Waiver must be designed and implemented to ensure biological resources are protected, and any potential impacts will be reduced to less than significant levels.

The revised Timber Waiver does not alter or weaken requirements for project proponents to comply with existing regulations regarding any species identified as a candidate, sensitive, or special status species that currently apply under the 2004 Non-Federal Timber Waiver. Specifically, Non-Federal Timber Waiver Prohibition 6 in Section V states, "The Discharger and Project shall comply with applicable local, state or federal laws and regulations." Timber harvest activities are subject to environmental impact evaluation and mitigation by the established processes used in planning those activities by the State of California and the Federal government. The California Endangered Species Act also requires measures to minimize and fully mitigate the impacts on endangered species, as do other requirements of the California Department of Fish and Game (CDFG). For example, CDFG Code section 1603 generally prohibits persons from substantially diverting or obstructing the natural flow or substantially changing the bed, channel, or bank of any river, stream, or lake designated by CDFG, or from using any material from the streambeds, unless they have first notified CDFG of

the activity. All rivers, streams, and lakes in California have been designated by CDFG, pursuant to California Code of Regulations, title 14, section 720. In addition, Section 1603 generally prohibits persons from commencing any activity affected by Section 1603 until CDFG has found that the activity will not substantially adversely affect an existing fish or wildlife resource, or until CDFG proposals, or the decisions of a panel of arbitrators assembled pursuant to procedures set forth in Section 1603, have been incorporated into the activity. CDFG enters into lake or streambed alteration agreements ("1603 Agreements") with those persons who notify CDFG of their proposed activities pursuant to Section 1603 in cases where CDFG determines the activities may substantially adversely affect an existing fish or wildlife resource.

The revised Non-Federal Timber Waiver does not alter or weaken the requirements of Clean Water Act (CWA) section 404. Unless exempted under 40 Code of Federal Regulations section 232.3, anyone proposing to conduct activities which may result in a discharge to surface waters and which require a federal permit (e.g., activities involving any discharge of dredged or fill material to waters of the United States, subject to U.S. Army Corps of Engineers permitting requirements under Clean Water Act section 404) must obtain a Clean Water Act section 401 Water Quality Certification from the Water Regional for those activities requiring an Army Corps of Engineers section 404 Permit.

A Clean Water Act section 401 Water Quality Certification is an order issued by the Water Quality Control Board determining that the proposed activity will not violate water quality standards and will protect the water for beneficial uses. At a minimum, any loss of wetlands must be replaced by a wetland of at least equal function, value and area. Timber harvest activities are generally exempt from the requirement to obtain a Clean Water Act section 404 permit. However, for activities that are not exempt, the revised Non-Federal Timber Waiver requires compliance with Clean Water Act section 404 and section 401 certification from the Regional Water Board prior to discharging. These requirements ensure that impacts to wetlands will remain at less than significant levels if an activity is subject to regulation under a Clean Water Act section 404 permit.

Therefore, any impacts to biological resources in the project area are mitigated by the criteria and conditions contained in the revised Non-Federal Timber Waiver, and by regulations protecting biological resources that currently exist under the 2004 Timber Waiver. The appropriate finding is **less than significant with mitigation incorporation**.

- e-f) The revised Timber Waiver does not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. As stated in Non-Federal Timber Waiver Prohibition 6, the revised Non-Federal Timber Waiver does preclude the Discharger from the need to comply with applicable local, state or federal laws and regulations. The requirements of any habitat conservation plan are not superseded by the revised Non-Federal Timber Waiver. Therefore, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES</b> -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
d) Disturb any human remains, including those interred outside of formal cemeteries?				X

a-d) The revised Non-Federal Timber Waiver will not alter the need to comply with CEQA and other State and federal laws that require analysis, disclosure, and mitigation of potential impacts to cultural resources to less than significant levels.

The adoption and implementation of this project does not change the regulatory requirements, statutory authorities, or enforcement abilities of any other agency which may have jurisdiction over cultural resources related to vegetation management. Therefore, any impacts to the cultural resources of the project area will not be changed over existing conditions by the adoption and implementation of the revised Timber Waiver, and the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VI. GEOLOGY AND SOILS</b> -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?		X		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		X		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X

- a i-iii) The revised Non-Federal Timber Waiver does not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure, including liquefaction. Because the project does not involve these factors, the appropriate finding is **no impact**.
- a iv) The revised Non-Federal Timber Waiver does not change the exposure of people or structures to potential substantial adverse effects involving landslides due to timber harvesting activities over current conditions. The revised Non-Federal Timber Waiver contains criteria and conditions related to activities on steep slopes, slides, and unstable areas similar to those specified in the 2004 Non-Federal Timber Waiver. No change in the risk of landslide due to timber harvesting activities is foreseeable: the appropriate finding is **no impact**.
- b-c) The revised Non-Federal Timber Waiver contains both general conditions and category-specific conditions and criteria to ensure that activities that proceed under the waiver will have less than significant impacts to soil and geological resources, and includes mitigation measures to prevent substantial soil erosion, loss of topsoil or risks due to unstable soils.

Non-Federal Timber Waiver General Condition 2 requires compliance with the Basin Plan, and prohibits the creation of a pollution, contamination, or nuisance, as defined by the California Water Code section 13050. Compliance with Basin Plan means that water quality objectives and waste discharge prohibitions must not be violated by activities that proceed under the revised Non-Federal Timber Waiver. Region-wide prohibitions relevant to soil erosion include those that prohibit discharges of waste (including waste earthen material such as soil, silt, sand, clay, rock, or other organic or mineral material) which violate any numeric or narrative water quality objective, including the Nondegradation Objective. Region-wide water quality objectives (either narrative or numeric) establish standards for constituents that may result from erosion due to timber harvest activities such as sediment, settleable and suspended materials, nondegradation of aquatic communities and populations, and pesticides. Because the revised Non-Federal Timber Waiver prohibits exceedence of these objectives, any impacts from soil erosion due to activities that proceed under the waiver will be less than significant.

The revised Non-Federal Timber Waiver does not alter or weaken the requirement for project proponents to comply with existing regulations regarding soils resources. Specifically, Non-Federal Timber Waiver Prohibition 6 in Section V states that "The Discharger and Project shall comply with applicable local, state or federal laws and regulations."

The adoption and implementation of this project does not change the regulatory requirements, statutory authorities, or enforcement abilities of any other agency which may have jurisdiction over soils resources related to vegetation management (e.g., requirements for erosion control or grading ordinances by state, local or federal agencies, or county air districts).

Therefore, any impacts to geology and soils in the project area are mitigated by the criteria and conditions contained in the revised Non-Federal Timber Waiver, and by regulations governing soil erosion that currently exist under the 2004 Non-Federal Timber Waiver. The appropriate finding is **less than significant with mitigation incorporation**.

- d) The proposed project does not involve activities such as building construction that are subject to the Uniform Building Code. Because the project does not involve this element, the appropriate finding is **no impact**.
- e) The proposed project does not involve septic tanks or alternative wastewater disposal systems. Because the project does not involve these elements, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VII. HAZARDS AND HAZARDOUS MATERIALS:</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport				X



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

a-b) Timber harvesting activities can involve the transport and use of materials that would qualify as hazardous pursuant to the California Health and Safety Code section 25501(o). These materials include gasoline and diesel to fuel equipment, hydraulic fluid associated with equipment operations and machinery, and silvicultural herbicides. The presence and use of gasoline, diesel, and hydraulic fluid should be limited to the amounts needed to operate timber harvesting equipment and will not be present in amounts to cause a significant hazard to the public or the environment. The revised Non-Federal Timber Waiver will not alter or weaken the need to comply with existing regulations regarding hazardous materials that currently apply under the 2004 Non-Federal Timber Waiver.

Silvicultural herbicides permitted under this revised Non-Federal Timber Waiver include the application of imazapyr directly to tree stumps. The amounts needed to treat tree stumps are nominal and will not cause a significant hazard to the public or the environment.

As required under the 2004 Non-Federal Timber Waiver other applications of herbicides will not be permitted under the revised Non-Federal Timber Waiver unless the type(s) of herbicide, method and area of application, and measures to assure compliance with the Basin Plan are submitted to Regional Water Board staff prior to the proposed date of

application. The Regional Water Board will not permit herbicide applications under the revised Non-Federal Timber Waiver that will result in a hazard to the public or environment.

The revised Timber Waiver would not weaken the need to comply with existing regulations regarding hazardous materials that currently apply under the 2004 Non-Federal Timber Waiver. Additionally, Non-Federal Timber Waiver Prohibition 3 in Section V states that, “The Discharger shall not cause or threaten to cause pollution, contamination, or nuisance, as defined by CWC Section 13050.” Therefore, the appropriate finding is **no impact**.

- c) The proposed project would not result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the appropriate finding is **no impact**.
- d) The proposed project does not alter or weaken any requirements to identify risks due to hazardous materials sites pursuant to Government Code Section 65962.5. Therefore, the appropriate finding is **no impact**.
- e-f) The proposed project would not result in a change over current conditions related to activities near an airport or airstrip that would result in a safety hazard. Therefore, the appropriate finding is **no impact**.
- g) The proposed project would not interfere with an emergency evacuation or response plan; therefore, the appropriate finding is **no impact**.
- h) The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?. The appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VIII. HYDROLOGY AND WATER QUALITY</b> -- Would the project:				
a) Violate any water quality standards or waste discharge requirements?		X		
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater			X	

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?		X		
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		X		
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?		X		
f) Otherwise substantially degrade water quality?		X		
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?		X		
j) Inundation by seiche, tsunami, or mudflow?		X		

a, c, d, e, f, i, j ) The revised Non-Federal Timber Waiver contains both general conditions and category-specific conditions and criteria to ensure that activities that proceed under the waiver will have less than significant impacts to hydrology and water quality, including to drainage patterns, excessive and/or polluted runoff, on- or off-site erosion or flooding. The revised Non-Federal Timber Waiver also prohibits the violation of any water quality standards or waste discharge requirements.

Non-Federal Timber Waiver General Condition 2 requires compliance with the Basin Plan, and Prohibition 3 in Section V prohibits the creation of a pollution, contamination, or nuisance, as defined by the California Water Code section 13050. Compliance with Basin Plan means that water quality objectives and waste discharge prohibitions must not be violated by activities that proceed under the revised Non-Federal Timber Waiver. Region-wide waste discharge prohibitions to protect water quality include those that prohibit discharges of waste (including waste earthen material such as soil, silt, sand, clay, rock, or other organic or mineral material) which violate any numeric or narrative water quality objective, including the Nondegradation Objective. Region-wide water quality objectives (either narrative or numeric) establish standards for constituents that may result from timber harvest and vegetation management activities such as sediment, settleable and suspended materials, nondegradation of aquatic communities and populations, and pesticides.

The revised Timber Waiver does not alter or weaken the requirement for project proponents to comply with existing regulations regarding soils resources that currently apply under the 2004 Non-Federal Timber Waiver. Specifically, Non-Federal Timber Waiver Prohibition 6 in Section V states that the Discharger and Project, “shall comply with applicable local, state or federal laws and regulations.”

Conditions that apply to all revised Non-Federal Timber Waiver categories prohibit adverse impacts to water quality resulting from discharges associated with timber harvest activities. The revised Non-Federal Timber Waiver will apply only to timber harvest activities that meet all applicable eligibility criteria and that comply with the waiver conditions. The Regional Water Board or its Executive Officer may terminate eligibility for coverage under the revised Timber Waiver at any time for a particular activity if the eligibility criteria are not met or the conditions not followed. The Regional Water Board or its Executive Officer may also take enforcement actions in accordance with the California Water Code to ensure actions are taken to prevent or correct water quality impacts. Therefore, the appropriate finding is **less than significant with mitigation incorporation**.

- b) The revised Non-Federal Timber Waiver does not involve activities that could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The appropriate finding is **less than significant impact**.

- g, h) The revised Non-Federal Timber Waiver does not involve placing housing or structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Because the project does not involve this element, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>IX. LAND USE AND PLANNING -</b> Would the project:				
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

- a-b) The proposed project does not divide an established community or involve land use planning or policy. Because the project does not involve these elements, the appropriate finding is **no impact**.
- c) The adoption and implementation of the revised Non-Federal Timber Waiver does not change the regulatory requirements, statutory authorities, or enforcement abilities of the Regional Water Board, nor does it alter or weaken the requirements of any applicable conservation plan that may apply to vegetation management activities. Therefore, existing conditions related to habitat or natural community conservation plans will not be changed by the adoption of the revised Non-Federal Timber Waiver, and the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>X. MINERAL RESOURCES</b> -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

a-b) The proposed project does not involve mineral resources; therefore, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XI. NOISE:</b> Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				X
e) For a project located within an airport				X

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

- a-f) The proposed project does not change the exposure of people to potential adverse effects involving noise due to vegetation management activities over current conditions. Noise levels due to vegetation removal activities in the project area will remain the same whether or not the revised Non-Federal Timber Waiver is adopted and implemented. Changes in the revised Timber Waiver do not impact noise levels from timber harvest and vegetation management activities. Because no change is foreseeable, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XII. POPULATION AND HOUSING --</b> Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

- a-c) The proposed project does not involve construction of new homes, businesses, or infrastructure. The project would also not displace people or existing housing. Because the proposed project does not involve these elements, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XIII. PUBLIC SERVICES</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?				X
Police protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

- a) The proposed project does not involve new or physically altered government facilities. Because the proposed project does not involve these elements, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XIV. RECREATION --</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X



b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
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a-b) The proposed project does not involve increasing the use of recreational facilities, or require construction or expansion of recreational facilities. Because the proposed project does not involve these elements, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XV. TRANSPORTATION/TRAFFIC --</b> Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?				X
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				X
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?				X
f) Result in inadequate parking capacity?				X

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

- a-b) The proposed project would not cause an increase in traffic or exceed a level of service due to vegetation management activities over current conditions. Traffic levels related to vegetation management activities in the project area will remain the same whether or not the revised Non-Federal Timber Waiver is adopted and implemented. Because no change is foreseeable, the appropriate finding is **no impact**.
- c) The proposed project does not involve air traffic. Because the proposed project does not involve this element, the appropriate finding is **no impact**.
- d) The proposed project does not involve installation of hazardous design features. Because the proposed project does not involve this element, the appropriate finding is **no impact**.
- e-f) The proposed project does not affect emergency access or parking capacity; therefore, the appropriate finding is **no impact**.
- g) The proposed project does not involve alternative transportation. Because the proposed project does not involve this element, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVI. UTILITIES AND SERVICE SYSTEMS</b> Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?				X
f) Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?				X
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

- a-c) The proposed project does not involve the expansion or construction of wastewater or storm water treatment facilities. Because the proposed project does not involve these elements, the appropriate finding is **no impact**.
- d) The proposed project does not change the need for water supplies due to vegetation management activities over current conditions. The need for water supplies to serve vegetation removal activities (e.g., for dust abatement) in the project area will remain the same whether or not the revised Timber Waiver is adopted and implemented. Because no change is foreseeable, the appropriate finding is **no impact**.
- e) The proposed project does not require service by wastewater treatment facilities. Because the proposed project does not involve this element, the appropriate finding is **no impact**.
- f) The proposed project would not affect solid waste generation or landfill capacities over current conditions. Because no change is foreseeable, the appropriate finding is **no impact**.

- g) The proposed project will not involve solid waste and is not subject to federal, state, and local statutes and regulations related to solid waste, therefore the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVII. MANDATORY FINDINGS OF SIGNIFICANCE --</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

- a) Timber harvesting activities have the potential to degrade the quality of the environment; however, conditions and criteria that apply to all revisions to the Non-Federal Timber Waiver mitigate significant adverse impacts from discharges associated with timber harvest activities to less than significant levels. The revised Non-Federal Timber Waiver will only apply to timber harvest activities that meet all applicable eligibility criteria and that follow the waiver conditions.

The Regional Water Board determines that timber harvesting activities conducted in compliance with the revised Non-Federal Timber Waiver will not adversely affect the

quality or the beneficial uses of the waters of the State, and will be in the public interest pursuant to California Water Code (Water Code) section 13269. In addition to the environmental protection afforded by the adoption of this revised Non-Federal Timber Waiver, the Regional Water Board will continue to rely on the environmental safeguards provided through the existing State and federal timber harvest activity review processes described in this Initial Study. Therefore, the appropriate finding is **less than significant with mitigation incorporation**.

- b) Timber harvest activities could have impacts that are individually limited, but cumulatively considerable; however, conditions and criteria that apply to all revised Timber Waiver categories mitigate significant cumulative adverse impacts from discharges associated with timber harvest activities to less than significant levels. The revised Timber Waiver will only apply to timber harvest activities that meet all applicable eligibility criteria and that follow the waiver conditions. Therefore, activities conducted in compliance with the Timber Waiver conditions will not contribute to cumulative impacts.

The Regional Water Board determines that timber harvest activities conducted in compliance with the revised Non-Federal Timber Waiver will not adversely affect the quality or the beneficial uses of the waters of the State, and will be in the public interest pursuant to Water Code section 13269. In addition to the environmental protection afforded by the adoption of this revised Non-Federal Timber Waiver, the Regional Water Board will continue to rely on the environmental safeguards provided through the existing State and federal timber harvest activity review processes described in this Initial Study. Therefore, the appropriate finding is **less than significant with mitigation incorporation**.

- c) It is unlikely that timber harvest activities could have environmental effects which may cause substantial adverse effects on human beings, either directly or indirectly. However, conditions and criteria that apply to the revised Non-Federal Timber Waiver mitigate significant cumulative adverse impacts from discharges associated with timber harvest activities to less than significant levels. The revised Non-Federal Timber Waiver will only apply to timber harvest activities that meet all applicable eligibility criteria and that follow the waiver conditions.

The Regional Water Board determines that timber harvest activities conducted in compliance with the revised Non-Federal Timber Waiver will not adversely affect the quality or the beneficial uses of the waters of the State and is in the public interest pursuant to Water Code section 13269. Therefore, the appropriate finding is **less than significant**.

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